

CAUSE NUMBER PD-0771-17

IN THE TEXAS COURT OF CRIMINAL APPEALS

FILED
COURT OF CRIMINAL APPEALS
3/28/2018
DEANA WILLIAMSON, CLERK

JOHN CHAMBERS,
Petitioner,
v.
THE STATE OF TEXAS,
Respondent.

On review of the Affirmation by the
Thirteenth District of Texas Court of Appeals of Edinburg-Corpus Christi
Of the Judgment of the 103rd Judicial District Court of Cameron County, Texas
In Cause Number 2015 – DCR – 268 – D.

**FIRST MOTION FOR EXTENSION OF TIME
TO FILE RESPONDENT'S BRIEF ON THE MERITS**

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ATTORNEY FOR RESPONDENT

TO THE HONORABLE JUDGES OF SAID COURT:

Comes now, Respondent, The State of Texas, by the County and District Attorney of Cameron County, Texas, and presents this Motion for Extension of Time to File Respondent's Brief on the Merits in the above-styled and -numbered cause of action. This is Respondent's first motion for extension of time.

Respondent's Brief is presently due Thursday, March 29, 2018. The undersigned counsel, Lena C. Chaisson-Muñoz, requests this Honorable Court grant an additional forty-five (45) days to file the Respondent's Brief, making it due Monday, May 14, 2018.

The undersigned Assistant District Attorney of Cameron County, Texas, is privileged to represent the State of Texas in this matter. The appellate division of the Cameron County District Attorney's Office is comprised of the undersigned attorney and her supervising attorney. Since mid-February, the supervising attorney has endured a series of serious medical issues, such that he was out of the office for several weeks. The undersigned has had to fulfill the appellate obligations of her office mostly alone during the pendency of time to work on her Brief, and she has been unable to provide adequate attention to this matter given the gravity of the issues, to ensure that Justice is done.

The extension is being sought for good cause and not for unnecessary delay.

Petitioner's counsel is not opposed to this request.

PRAYER

WHEREFORE, PREMISES CONSIDERED, the State of Texas prays the Honorable Court of Criminal Appeals will grant this request for an extension of forty-five (45) days to file the Respondent's Brief, and allow for the filing to be due on Monday, May 14, 2018.

Respectfully Submitted,

LUIS V. SAENZ
Cameron County and District Attorney

/s/ Lena C. Chaisson-Muñoz

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Certificate of Conference

I certify that on Friday, March 23, 2018, I corresponded via electronic mail with Petitioners' counsel regarding the contents of this motion. I further certify that on the same day I was advised by Mr. Chad Van Brunt that Petitioners' counsel is not opposed to contents of this motion.

/s/ Lena C. Chaisson-Muñoz

Lena C. Chaisson-Muñoz

Certificate of Service

I certify that on Tuesday, March 27, 2018, a copy of the foregoing First Motion for Extension of Time to File Respondent's Brief on the Merits was served to the following attorneys of record for Petitioner John Chambers via electronic mail.

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/s/ Lena C. Chaisson-Muñoz

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